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UBER TECHNOLOGIES, INC.  
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

WAYMO LLC,  
  
Plaintiff,  
  
v.  
  
UBER TECHNOLOGIES, INC.,  
OTTOMOTTO LLC; OTTO TRUCKING LLC,  
  
Defendant.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF  
JOHN LAHAD IN SUPPORT OF  
DEFENDANTS UBER  
TECHNOLOGIES, INC. AND  
OTTOMOTTO LLC'S  
PRECIS LETTER REQUESTING  
PERMISSION TO FILE MOTION  
FOR SUMMARY JUDGMENT**

Judge: The Honorable William Alsup  
Trial Date: October 10, 2017

1 I, John Lahad, declare as follows:

2 1. I am an attorney with the law firm of Susman Godfrey LLP. I am a member in  
3 good standing of the Bar of the State of Texas. I make this declaration based on personal  
4 knowledge and, if called as a witness, I could and would testify competently to the matters set  
5 forth herein. I make this declaration in support of Defendants Uber Technologies, Inc. and  
6 Ottomotto LLC's Precis Letter Requesting Permission to File a Motion for Summary Judgment.

7 2. Attached as **Exhibit 1** are true and correct excerpts of the August 11, 2017  
8 deposition of Andrew Wolfe.

9 3. Attached as **Exhibit 2** are true and correct excerpts of the August 3, 2017  
10 deposition of Pierre-Yves Droz in his capacity as a 30(b)(6) witness for Waymo.

11 4. Attached as **Exhibit 3** are true and correct excerpts of the July 12, 2017 deposition  
12 of William McCann.

13 5. Attached as **Exhibit 4** is a true and correct copy of a document marked as Exhibit  
14 1078 at the deposition of William McCann.

15 6. Attached as **Exhibit 5** is a true and correct copy of U.S. Patent No. 8,559,107 to  
16 Chann et al.

17  
18 I declare under penalty of perjury under the laws of the United States that the foregoing is  
19 true and correct. Executed this 22nd day of August, 2017, in Houston, Texas.

20  
21 /s/ John Lahad  
22 JOHN LAHAD  
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**ATTESTATION OF E-FILED SIGNATURE**

I, Arturo J. González, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that John Lahad has concurred in this filing.

Dated: August 22, 2017

/s/ Arturo J. González  
ARTURO J. GONZÁLEZ